

NOV 30 1999

Honorable Kelley S. Coyner
Administrator
Research and Special Programs Administration
Washington, D.C. 20590

Dear Ms. Coyner:

The National Transportation Safety Board received your April 12, 1999, letter responding to Safety Recommendations P-98-34 through -38, which were issued to the Research and Special Programs Administration (RSPA) on April 30, 1998, as a result of the Safety Board's investigation of the August 24, 1996, butane pipeline rupture and fire in Lively, Texas. The Board is aware that some of the dates noted in your letter have passed but understands that all projects mentioned in your letter are ongoing.

Safety Recommendation P-98-34 urged RSPA to require that Koch Pipeline Company LP (Koch), evaluate the integrity of the remainder of its highly volatile liquid (HVL) pipeline, including the condition of the coating, and rehabilitate the pipeline as necessary.

The Safety Board understands that RSPA issued a Hazardous Facility Order (HFO) to Koch on October 7, 1996, requiring it to take certain corrective measures on its HVL pipeline between Medford, Oklahoma, and Mont Belvieu, Texas, subsequent to the 1996 pipeline rupture.

In addition, RSPA directed that the affected Koch pipeline remain out of service until 1) RSPA approved a plan for identifying and correcting areas of continuing corrosion; 2) various public awareness actions, acceptable to RSPA were undertaken; and 3) a reasonable and prudent operating scenario was established by Koch and approved by RSPA. Koch was also required to submit a plan to establish a program of tests to identify and address the external corrosion problem on the Sterling #1 HVL line. This program mandated the use of internal instrumented inspection devices or "smart pigs," close-interval surveys, public awareness actions, redetermination of allowable operating pressures, and corrosion mitigation measures; RSPA is reviewing and monitoring all these required actions.

The Safety Board understands that RSPA staff have been meeting with Koch staff to verify completion of the actions required by the HFO. The Board notes RSPA is reviewing data submitted by Koch, that some tests are ongoing, and that Koch is revising some of its public education materials. The Safety Board requests that RSPA continue to monitor Koch's actions on this matter including evaluation of the coating on the remaining portion of the pipeline from Medford, Oklahoma, to Mont Belvieu, Texas, and to inform the Board when it is satisfied that all issues have been resolved. Pending further information from RSPA, Safety Recommendation P-98-34 has been classified "Open—Acceptable Response."

Safety Recommendations P-98-35 through -38 asked that RSPA revise 49 *Code of Federal Regulations* Part 195 to:

1. Require pipeline operators to determine the condition of pipeline coating whenever pipe is exposed and, if degradation is found, to evaluate the coating condition of the pipeline; (P-98-35)
2. Include performance measures for the adequate cathodic protection of liquid pipeline. (P-98-36)
3. To include requirements for the content and distribution of liquid pipeline operators' public education programs. (P-98-37)
4. Require that pipeline operators periodically evaluate the effectiveness of their public education programs using scientific techniques. (P-98-38)

The Safety Board understands that RSPA plans to make the appropriate amendments to 49 CFR, as requested, for all these recommendations. Pending the publication of the final rules, Safety Recommendations P-98-35 through -38 have been classified "Open—Acceptable Response." The Board would appreciate periodic updates on the status of these amendments.

Sincerely,

ORIGINAL SIGNED BY
JIM HALL

Jim Hall
Chairman

cc: Mr. Robert Clarke, Safety and Health Team Leader
Office of Transportation Policy Development